

Crystal Palace Community Association comments on the Crystal Palace Area 'Pen Portraits' and 'Issues' section:

LB Bromley – Draft Local Development Framework Core Strategy Issues Document, July 2011 Area Pen Portraits - 3.1.10 Crystal Palace, Penge and Anerley

3.1.10.15 Key Issues and Main Opportunities

Neighbourhood Issue 3.51. What issues arise from the identification in the draft London Plan of Anerley and Penge as "Areas for Regeneration"?

The London Plan is now published as of July 2011. Upper Norwood / Crystal Palace is just one of over 200 town centres classified and marked 'R' for regeneration with 'Medium' growth. No other detail is given and Anerley and Penge are not mentioned in the adopted Plan.

The Upper Norwood / Crystal Palace area has a very distinctive, charismatic nature and contains a number of Conservation Areas. It is the highest point in South London and suffers marginalisation being at the edge of 4 Boroughs and divided between them. From the point of residents living here it is an attractive, vibrant community.

There is opportunity for sympathetic and sustainable regeneration; however, this should be achieved through collaboration between Bromley and the other adjacent boroughs and through their Core Strategies for the area. It would be useful to show the Triangle town centre in Bromley's Core Strategy Map and the areas that fall under the control of the other boroughs. Currently there seems to be no strategy that requires or encourages boroughs that have 'overlapping' interests to work together in developing area plans. A length of Church Road, lying with the Borough of Bromley, is part of the Upper Norwood Triangle District Centre and should be identified accordingly.

Neighbourhood Issue 3.52. What opportunities are there to provide enhanced provision for the community, in particular for young people, as well as modern healthcare facilities and facilities to meet demands for education?

Despite CPCA concerns over elements of the LDA Crystal Palace Park Masterplan, such as the sale of protected parkland for private luxury housing, the concept of a post-Olympic Regional Sports Centre on the southern edge of the Park would provide much-needed sports facilities, health benefits and jobs for the area. The original Masterplan envisaged the removal of the listed NSC building to return it to parkland.

3.1.10.12 of the Core Strategy Issues Document *asserts '...growing local desire for a mixed secondary school'*. This statement appears without any supporting evidence. There has been some recent speculation (mainly in the local press) that a new 'free' school should be built in the Park, however this would result in the unacceptable loss of irreplaceable, protected parkland. If there is a demand for additional educational facilities this should be met without compromising publicly-accessible parkland.

Although frequently criticised by Bromley Council, the 'Greenwich Judgement' allows pupils to attend schools more local and convenient to them irrespective of arbitrary and invisible borough boundaries.

Neighbourhood issue 3.53. What are the opportunities and challenges of coordinating plans and the provision of facilities and services shared across borough boundaries?

In the predominantly residential area of Crystal Palace, Anerley Library serves its own catchment area and is the only major civic building and community hub in a Government-designated area of deprivation. Despite being poorly signed from the road, the number of visits rivals other libraries and it is the focus for many community activities.

In considering cross-borough cooperation and shared resources, Bromley has declined to contribute towards the running of Upper Norwood Joint Library. UNJL is jointly funded by both Lambeth (where it is located) and Croydon councils. Both councils have repeatedly failed to meet the funding formula for the country's only independent library making it a poor model for cross-borough coordination and cooperation on other services. However, there may be savings to be made in sharing and streamlining some front-line and back-room services.

Policing: Crime statistics for four boroughs meeting in Crystal Palace (Bromley, Croydon, Southwark & Lambeth) are divided, perhaps meaning fewer resources than would be applied if the town occupied a single ward. The CPCA considers that a dedicated police team, specific to the Upper Norwood area, could provide significant cost-savings, improved intelligence, faster response, local accountability and reduced crime rates.

Neighbourhood issue 3.54. How much additional development is desirable or needed?

Development can take many forms e.g.; commercial, residential, educational and infrastructure. Developments will, in the main, be demand or economically-led. Applications should be considered on their own merits and with due regard to planning regulations and obligations. Respect should be paid to the sense of identity and history of the area, the sustainability of the proposal and the impact on the community; particularly where new development may contain undesirable elements that might impact adversely on the community.

Neighbourhood issue 3.55. Is there a need to increase the amount of family housing and what are the opportunities for achieving this?

Continued population growth will inevitably result in the need for more family housing, both social and private. It is important that in the rush to achieve more homes that we do not create 'tomorrow's slums'.

The date set for 'zero-carbon' emissions for new homes in Britain is 2016. Buildings that fail to meet this emission target will pollute for their entire lives locking those, especially in social housing who can least afford it, into upward spiralling energy costs.

Where appropriate, all new development must incorporate the latest energy-saving technologies, such as ground-source heat pumps, combined heat and power, solar and wind-power and heat and energy-saving design. There should be good room-sizes and amenity space for both private and social housing, following the now defunct Parker-Morris-style standards, together with easy access to public transport. Developments should not be driven by maximum housing density requirement, number of units per hectare and the pursuit of developers overly ambitious profits.

Neighbourhood issue 3.56. What can be done to address the issue of pressure on and access to local parks?

The largest pressures facing our parks today is that of capital requirement, revenue stream and development demand. Although not statutory, parks play a vital role in our urban fabric.

Council Tax payers should be given the option of contributing more to the upkeep of their parks or volunteering to carry out some roles of park maintenance and management.

Income generated through a park or green space 'precept' should be 'ring-fenced' to ensure that monies are used exclusively to benefit such public spaces.

Carefully controlled corporate sponsorship could also be encouraged to contribute to capital park-related schemes or revenue income.

Key is keeping things simple and affordable, i.e. concentrate on park landscaping, public facilities, access and security.

Neighbourhood issue 3.57. What is the future for Crystal Palace Park and how can this benefit the wider area?

Crystal Palace Park is MOL, Grade II* registered (not indicated in the Core Strategy Draft) on the English Heritage Register - the only such historic park in the Borough of Bromley. Much of it is a conservation area. As such the Park, with its international historic significance, should be considered a jewel in Bromley's park portfolio. The Park plays a pivotal neighbourhood role, being an oasis of calm and beauty, in an area of high residential density and business development. The benefits to an area of a well-maintained local park are well documented.

CPCA concerns over the LDA 'Masterplan' for the Park are widely recognised and we would refer readers of this response to LBB's draft Core Strategy document to our letter of objection to the Masterplan application. This can be found on our website; www.cPCA.org.uk.

At 3.1.10.10 there is reference to '*...informal proposals for new sports facilities put forward by a major local football club*'. The CPCA assumes that this is a reference to the Crystal Palace Football Club's ambition to relocate from their existing ground in Selhurst, to the National Sports Centre in the Park. Rather than deal with this in detail, in this document, we would refer to the article on page 9 of our Summer 2011 newsletter, which deals with the matter in some depth. Again this can be found on the CPCA website.

The CPCA recognise that some sensitive 'restoration' to the Park would be welcome. Intervention should be incremental and modest as has been demonstrated by the removal of the derelict NSC turnstiles and bridge at the low-level station and the introduction of attractive landscaping. Other worthwhile improvements include the refurbishment of the Maze, the replacement railings around the Tidal lakes and the repair of the waterfall. Public toilet facilities in the Park remain poor, with none available in the west of the Park.

Although at an early stage, the CPCA has reservations over Bromley's exploratory proposals to establish a 'Trust' to manage and govern Bromley's only Grade II* registered MOL Park. While elements of the 'Vision Statement' contained in the Report (DRR11/091) are commendable the need for the Park to be financially 'self-supporting' by creating its own capital and revenue income are concerning. Such a business model would be a radical departure from the established democratically based council-funded system which has worked reasonably well over the decades and which will still apply to Bromley's other parks.

The establishment of a Trust, dependent on income generated from speculative means, will place financial pressure on the Trust pressuring them to consider applications for commercial exploitation of irreplaceable 'protected' public parkland.

There is no mention of a 'Plan B' should the Trust be unable to raise sufficient capital and revenue funding to ensure the future of the Park as a public Grade II* registered asset, MOL and Conservation Area. This is of particular importance, given the increased demands being placed on funding bodies such as the HLF.

The CPCA has additional concerns over the suggested appointments to the Trust's Executive Project Board where a number of appointees have existing commercial interests in the Park or, as in the case of English Heritage, have previously supported large-scale commercial development on the Park. Certain appointees to the Trust's Executive Project Board also have positions on the Site Management and Heritage boards, giving them an unrepresentative say in any future Trust proposals for the Park.

Crystal Palace Park already has significant income potential from the transmitting tower, the Thames Water reservoir, the Caravan Club, the bus station, the NSC and other smaller enterprises. These revenue streams should be maximised (if necessary by renegotiating, where possible) and ring-fenced solely for the benefit of the Park. It is likely that this enhanced income would provide sufficient revenue, in itself, to provide for the Park on an annual basis.

It is noted that Bromley are not currently considering 'trust status' for any other Bromley park.

Neighbourhood issue 3.58. How can the character of the area and the quality of the public realm be enhanced given the density of dwellings and significant on street parking?

The character or 'grain' of an area is a combination of factors. It may be historic or contemporary in nature – or a mix of both. It may contain particular features, amenities or facilities that specifically mark it out. These are often socially explicit and a reason that people choose to live or work in an area. New developments, and planning permissions, should pay particular regard to the integration of the development into the area.

Personal transport is a modern element of society and an essential requirement for many when conducting their business. Greater emphasis should be placed on providing discrete parking provision within new developments, rather than the current trend of reducing parking availability – forcing car owners to park in the streets.

Note: There used to be 'minimum parking standards' for new housing development (of say 1 space per bedroom) of off-street parking to avoid exacerbating on-street problems. The previous government introduced 'maximum parking standards' preventing new development from having adequate parking. This included the requirement for fewer parking spaces for 'affordable housing'. This was designed to encourage people not to have cars and use public transport. In reality people were forced to park their vehicles in neighbouring streets, adding further to parking congestion.

The creation of controlled parking zones (CPZ's) is often viewed by boroughs as a way of dealing with parking 'difficulties' in areas of high parking requirement. However in considering such an approach great care has to be taken if displacement parking is not to occur in neighbouring streets – often to the considerable and unfair inconvenience of those who live in those roads.

Neighbourhood issue 3.59. What are the opportunities to improve the attraction of Penge town centre, and the quality of the pedestrian environment in the High Street?

Only a few years ago significant SRB money was invested in Penge in an effort to 'regenerate' the High Street. Works included new paving, cycle stands, tree planting, and the creation of three 'public squares'. Ironically, the regeneration scheme removed a number of public benches, seemingly as they were occasionally used by individuals who had imbibed a little too much alcohol. Consequently there is nowhere now for the public to sit and rest before continuing their shopping.

It is debatable whether the street sculptures are value for money or eyesores. The clock outside the Crooked Billet PH is a small clock on what looks like an upended oil pipeline. The hour hand on one side has never been properly adjusted. Supposedly the material canopy atop the structure is meant to resemble a pterodactyl wings, relating to the Crystal palace Park dinosaurs.

There are some odd dinosaur feet outside MacDonald's restaurant. A metal and canvas structure outside the Blenheim Centre are understood to represent 'masts and sails', although the link is unclear. After much neglect the somewhat pointless structure has been refurbished, pigeon-proofed and the uprighters repaired.

Most of these new 'features' are alien to the High Street and do nothing to enhance the shopping experience in the High Street. They are however an additional financial burden on the borough - money that could be better spent employing the services of a shared Town Centre Manager.

A quality environment in terms of cleanliness, policing, affordable parking provision, a good business 'mix' and attractive shop fronts help make a place pleasant to visit.

The then SRB regeneration manager, Barbara Thompson, reported that the thing people most liked was not the expensive £100,000 schemes, but the simple hanging floral baskets.

Neighbourhood issue 3.60. Could diversification help to support the long stretches of shops along the main routes?

Previously Penge had a dedicated Town Centre Manager who often, with some difficulty, traced the owners of empty shops, sometimes owned by landlords or investment companies overseas. It was this work and contact that helped put empty shops back into use. The Council declined to fund a TCM post after the SRB grant finished – but the purpose of the grant was to kick-start improvements – which were not then continued (including maintenance of new street sculptures). Again, good public transport, affordable and easy local parking, attractive frontages, safety, mix of premises in terms of available 'offer' will help ensure the viability of local businesses.

One area that needs urgent attention, probably at a national level, is that of realistic leases and affordable rents, possibly by means of some form of rent control mechanism. However pressing a concern, this is clearly not an issue for inclusion in a borough's core strategy.

Neighbourhood issue 3.61. Can public transport links to Bromley Town Centre be improved?

There are frequent bus services on routes 227 and 358) and a train service from both Crystal Palace and Penge East to Bromley South, although there is no direct bus route from Crystal Palace to Elmers End – to link with the tram and rail services. Extensions to other services could be considered, however studies have demonstrated that improved transport links between large district centres and smaller satellites results in the larger centres attracting visitors away from the smaller ones. Despite this no studies have been conducted by the London Mayor, on any possible negative impact on trade in the Upper Norwood District Centre, if the Croydon Tramlink were to be extended to Crystal Palace.

Additional Comments 11. Are there any additional issues which we have not identified?

There are a number of errors in the Crystal Palace, Penge & Anerley Area Pen Portrait map.

1. CPP Conservation Area (Red cross-hatching) is not properly shown over most of the Park. The CPCA considers that Conservation Area status and MOL designation should now apply to the whole Park.
2. The green 'Open Space' legend is also missing on parkland at the rear of properties at the south end of CPP Rd (re-incorporated into the park decades ago).
3. There is no explanation for the green diamond legend – presumably it identifies the CP Bus terminus.
4. The railway line (black line) north east of CP Station is shown too far on the surface where it actually runs into a tunnel under the Ledrington Road entrance to the Park
5. Similarly north East of Penge East station the black line shows a surface railway line that is actually in a long tunnel to Sydenham Hill.
6. 3.1.10.1 Great Exhibition not 1861 but **1851** and in Hyde Park. Joseph Paxton's 'Crystal Palace' was dismantled and re-erected at the top of Sydenham Hill and opened in 1853.
7. 3.1.10.4 Correct 'Metropolitan Open Space' to 'Metropolitan Open Land'. Perhaps better to qualify 'Dinosaurs' as 'Dinosaur models' or 'statues'.
8. Table of areas (page 10, 1.0.9) – Some of the numbers do not correspond to the section numbers for the area pen portraits e.g. on the map CP is 11, in the document text it is section 10.

General notes:

- It would generally be useful throughout the CSI Document to show distinctions between MOL and UOS.
- Proposals not to renew the lease in 2019 of the Camping and Caravan Club site in Crystal Palace Park, as a consequence of the LDA 'Masterplan', will have a significant negative impact on jobs and the local economy.
- 3.1.10.8 It would be useful to give the date of the shop vacancy survey, both here and borough-wide.

The proposed Croydon Tram Extension was first costed at £70m (increased to £170m the following year) for 1.85 miles of track some of which would run through CP Park. Such a route, through the listed, MOL, conservation area and listed Park, would destroy Bromley Council's 1980's renovation of the Anerley Hill edge of the park – removing all the trees, ornate railings and semi-circular flower garden. 40-tonne trams would pose serious issues of public safety, to both Park users, pedestrians and the already heavy traffic on Anerley Hill.

There is already an 11-minute direct rail journey service from Crystal Palace to West Croydon.

There are changes in society that affect the character and perception of an area. Examples include the loss of resident park keepers and unstaffed railway stations. The impressive Penge Police Station (the oldest police station in Europe) has closed – replaced by a 'shop' in Maple Rd. Anerley Library, possibly the heart of Anerley, is threatened with closure while libraries borough-wide are threatened with closure or drastically shorter opening times. At Crystal Palace, the Upper Norwood Joint Library is also underfunded and threatened. Street sweeping is generally done mechanically – so areas by parked cars are not swept. Money is spent on grandiose street sculpture, which is then not maintained. Toilets are closed or missing from parks and High Streets and graffiti is not promptly removed.

The proposed Government revolution of the planning system for a vague, 60-page Draft National Planning Policy Framework to cover Transport, Housing, Open Space, Archaeology, Flooding, Shopping and Business Development and other matters will replace long-established and understood working rules, with a biased and unfair pro-development procedure.

The Revised Unitary Development Plan, adopted in 2006 and expected to last 10 years, incurred a huge amount of effort in correspondence, research, committee and Inquiry time, and unpaid amenity association time. Given that the borough has not undergone a seismic change in the past five years and in the interests of economy in terms of money and effort, many of the adopted policies, evolved from years of experience in managing the borough, are just as valid now as previously.

The CPCA suggest that as far as practicable, the Policies and Explanatory Text, be reused in the LDF.

Proposals Map – The CPCA is concerned that only Councillors, and not the general public and amenity groups, will have a say on any alterations to the Proposals map – which includes important land use designation (MOL, UOS, Conservation Areas etc).

The CPCA regard it as a matter of natural justice that borough plans, genuinely out for consultation, be open for comment in both the Written Statement and the Proposals and Land Use Designation Map. Many areas such as parks and conservation areas are just as deserving of protection, as they were 5 years ago – perhaps more so (Revised UDP 2006). Indeed if the Nation Planning Policy Framework favours unsympathetic and unwanted development, then the Local Plan needs strengthening to protect much-valued policies and aspects of our environment.

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CPCA Planning, 26 October 2011